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*Attorneys for Defendant*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,  
  
Plaintiff.

v.

NEGASI ZUBERI, aka JUSTIN JOSHUA  
HYCHE, aka SAKIMA ZUBERI,  
  
Defendant.

Case No. 1:23-cr-00254-MC

**JOINT PROPOSED STIPULATIONS**

The parties have reached an agreement as to two stipulations that will be read to the jury and provided as Court Exhibits. In addition, the parties have reached an agreement to allow certain evidence to be presented through a law enforcement agent.

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## **STIPULATIONS**

The two stipulations that will be read to the jury, and provided as Court Exhibits One and Two are as follows:

### **First Stipulation**

All of the firearms and ammunition in Counts 4, 5, 6 and 7, as listed on the verdict form:

- Are firearms and ammunition as defined by federal law; and
- Prior to July 15, 2023, had been shipped or transported in interstate and/or foreign commerce.

### **Second Stipulation**

The parties stipulate that Negasi Ishaiah Zuberi is also known as Sakima Zuberi, and previously had the legal names of Justin Joshua Hyche and Justin Kouassi. The parties further stipulate that on and prior to July 15, 2023, Negasi Ishaiah Zuberi knew that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year.

### **Jury Instructions**

We will also request that the jury be given the appropriate instruction:

### **2.3 Stipulations of Fact**

The parties have agreed to certain facts that have been stated to you and provided as Court Exhibits. Those facts are now conclusively established.

## **EVIDENTIARY AGREEMENT**

In addition to the stipulations, the parties have agreed as follows with respect to certain evidence:

The parties agree that the government will not call as witnesses “Quinn” or “June”, whose names or nicknames are found in the blue notebook. *See* Government Exhibits 150 and 168. Instead, the parties agree that a federal agent will testify that “June” and “Quinn” are both

real women who the FBI has interviewed. The agent will testify regarding both women's age, the nature of their relevant online accounts and online activity, the city they lived or worked in, the month and day of Quinn's birthdate and the nature of her employment. Further, for June, the agent will testify that Negasi Zuberi had a screenshot of June's Tryst page which was taken on July 1, 2023. The parties agree that "Quinn" refers to the woman whose nickname is more fully set forth in the above-described blue notebook. Should "Nessa" be identified, whose name or nickname appears in the same notebook, the parties will reach the same agreement.

DATED this 29<sup>th</sup> day of August 2024.

Respectfully submitted,

ANGELI LAW GROUP LLC

s/ Amy E. Potter  
Amy E. Potter  
*Attorney for Defendant*

Agreed to by:

  
\_\_\_\_\_  
Sakima Zuberi